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5 Attorneys for Plaintiff,
Fremont Bank, a California state
6 chartered bank

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9 **IN THE UNITED STATES DISTRICT COURT,**
10 **NORTHERN DISTRICT OF CALIFORNIA**
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13 FREMONT BANK, a California state
chartered bank,

14 Plaintiff,

15 v.

16 ROBERT J. SIGNORELLI, individually and
17 as Trustee of the SIGNORELLI FAMILY
LIVING TRUST, dated April 8, 1994,
18 amended February 28, 2001, November 22,
2005, and January 5, 2015; KATHRYN R.
19 SIGNORELLI, Trustee of the SIGNORELLI
FAMILY LIVING TRUST dated April 8,
20 1994, amended February 28, 2001,
November 22, 2005, and January 5, 2015;
21 and SIGNORELLI FAMILY, L.P., a Texas
limited partnership,

22 Defendants.
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CASE NO. 18-cv-04808-HSG

**PLAINTIFF'S MOTION TO MODIFY
BRIEFING SCHEDULE FOR MOTION
FOR RIGHT TO ATTACH ORDER.**

1 Plaintiff FREMONT BANK, a California state-chartered bank ("Plaintiff"), by and
2 through its attorneys of record, states as follows:

3 1. On August 31, 2018, Plaintiff filed a Motion for Right to Attach Order (the
4 "Motion") against Defendants Robert J. Signorelli, the Signorelli Family Trust, and the
5 Signorelli Family, L.P. (collectively the "Defendants").

6 2. The hearing on the Motion is set for December 13, 2018.

7 3. On September 13, 2018, the Court established a briefing schedule on the Motion
8 as follows: Defendants' Responses to be filed by September 14, 2018; Plaintiff's reply to be
9 filed by September 21, 2018.

10 4. Despite diligent efforts, Plaintiff was unable to serve the Defendants until
11 September 20, 2018, after the Responses to the motion were due. Due to the difficulties serving
12 Defendants, the parties require additional time to prepare and file their replies in this case.

13 5. By this Motion, Plaintiff respectfully moves for a modification of the briefing
14 schedules that would result in extending the time periods for the filing of briefs for Plaintiff and
15 Defendants. Plaintiff requests that the briefing schedule be modified as follows:

16 **Defendants' Responses: October 22, 2018**

17 **Plaintiff's Replies: October 29, 2018**

18 6. The date for oral argument is December 13, 2018, so the proposed modification in
19 the briefing schedule will not disrupt the Court's consideration of this case.

20 7. This motion is not brought for purposes of delay, but rather due to an inability to
21 serve Defendants. Plaintiff does not anticipate requiring additional extensions.

22 **WHEREFORE**, Plaintiff Fremont Bank respectfully prays that the Court enter an order
23 modifying the briefing schedule as set forth above.

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1 DATED: September 28, 2018

KIRSCHENBAUM LAW, PC

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3 By: Kristin L. Williams
4 KRISTIN L. WILLIAMS
5 Attorneys for Plaintiff
6 Fremont Bank
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GOOD CAUSE APPEARING,

1. Defendants Responses to Plaintiff's Motion for Right to Attach Order shall be due by **October 22, 2018**; and

2. Plaintiff Fremont Bank's Reply in Support of its Motion for Right to Attach Order shall be due by **October 29, 2018**.

IT IS SO ORDERED.

Dated: 10/1/2018


UNITED STATES DISTRICT JUDGE